

CLARK HILL, PLC
151 S. Old Woodward Ave., Ste. 200
Birmingham, Michigan 48009
Telephone: (248) 988-1817
Facsimile: (248) 988-2336
David M. Blau (P52542)

**Attorneys for Agree Limited Partnership, Lakewood Shopping
Center, LLC, and Crossroads Centre II, LLC**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

| | | |
|-------------------------------------|---|---------------------------------------|
| _____ | x | |
| | . | Chapter 11 |
| | . | |
| In re: | . | Case No. 18-23538-rdd |
| | . | |
| SEARS HOLDINGS CORPORATION., | . | |
| et al., | . | (Joint Administration Pending) |
| | . | |
| Debtors. | . | |
| _____ | x | |

MOTION FOR LEAVE TO APPEAR *PRO HAC VICE*

I, David M. Blau, hereby apply for leave to appear and participate in this case as one of the attorneys for **Agree Limited Partnership, Lakewood Shopping Center, LLC, and Crossroads Centre II, LLC** and in support of my application do aver that:

1. I am a member in good standing of the Bar of the State of Michigan licensed to practice before all courts of the State of Michigan. I am a member in good standing of the U.S. District Court for the Eastern and Western District of Michigan, the U.S. District for the District of Colorado, and the U.S. District Court for the Northern District of Illinois, and I am admitted to practice before the United States Court of Appeals for the Sixth Circuit.

2. I am currently admitted *pro hac vice* before the Bankruptcy Courts of the District of Delaware, Middle District of Tennessee, Eastern District of Virginia, Northern District of Ohio, Southern District of Indiana as well as before this Court in other matters.

3. Neither my admittance to practice nor my admittance *pro hac vice* has ever been revoked.

4. I am not a resident of, nor do I maintain offices in this District for the practice of law.

5. Upon approval of this Motion I agree to pay the \$200.00 fee due to the Clerk.

Dated this 15th day of October, 2018.

Dated: October 15, 2018

Respectfully submitted,

CLARK HILL, PLC

/s/ David M. Blau

David M. Blau (MI P52542)

151 S. Old Woodward Ave., Ste. 2000

Birmingham, MI 48009

Tel. (248) 988-1817

Fax. (248) 988-2336

Attorney for Agree Limited Partnership, Lakewood

Shopping Center, LLC, and Crossroads Centre II, LLC

dblau@clarkhill.com